

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

W.P.V. & W.P.O.,

Plaintiffs,

- against -

UNITED STATES OF AMERICA and CAYUGA
HOME FOR CHILDREN,

Defendants.

21 Civ. 04436 (JPC)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, the Declaration of David Garcia, the Declaration of James De La Cruz, and the Declaration of Cesar A. Cervantes, Defendant United States of America will move this Court for an order transferring this action to the Western District of Texas pursuant to 28 U.S.C. § 1404(a), or in the alternative, an order severing the claims against the United States and transferring those claims to the Western District of Texas.

Dated: New York, New York
June 22, 2022

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York
Attorney for Defendant United States

By: /s/ Rebecca R. Friedman
REBECCA R. FRIEDMAN
MOLLIE KORNREICH
Assistant United States Attorneys
86 Chambers Street, 3rd Floor
New York, New York 10007
Tel: (212) 637-2614 / 3274
Fax: (212) 637-2686
rebecca.friedman@usdoj.gov
mollie.kornreich@usdoj.gov